REMARKS

This Amendment is filed in response to the FINAL Office Action mailed August 10, 2007, and is also filed with a Request for Continued Examination (RCE) filed herewith. All objections and rejections are respectfully traversed.

Claims 1-5, and 30-64 are in the case.

Claims 30- 64 were added to better claim the invention.

Claims 1-5 were amended to better claim the invention.

Claims 6-29 were previously withdrawn. Claims 6-29 are cancelled without prejudice herein.

Request for Interview

The undersigned respectfully requests a telephonic interview with the Examiner after the Examiner has had an opportunity to consider this Amendment, but before the issuance of the next Office Action. The undersigned may be reached at 617-951-2500.

Rejections Under 35 U.S.C. § 101

At paragraphs 6 - 7 of the Office Action claims 1-5 were rejected under 35 U.S.C.

§ 101 as being unpatentable subject matter. Amendment of the claims is believed to sat-

isfy this rejection.

Rejections Under 35 U.S.C. § 102

At paragraphs 8 - 9 of the Office Action, claims 1-5 were rejected under 35

U.S.C. §102(b) as being unpatentable in view of Xu et al. U.S. Patent No. 6,324,581 is-

sued on November 27, 2001 (hereinafter "Xu").

Applicant's claimed novel invention, as set forth in representative claim 1, com-

prises in part:

1. A method for establishing identity in a file system, comprising:
   receiving a file request concerning an indicated file from a client, the request received by a proxy;
   forwarding the request from the proxy to a file server;
   returning a reply associated with the file request from the file server to the proxy;
   inserting, by the proxy, metadata into the file handle; and
   sending, by the proxy, the file handle with the metadata inserted in the file handle to the client, the metadata to be used in further requests to identify the client and the indicated file.

Xu discloses data movers to control access to respective file systems in data stor-

age. A data mover which bypasses an owner of a file to access the file is described.

Metadata is exchanged by the owner and the data mover. The metadata includes disk

block numbers and pointers to block numbers holding the file. (Xu Col. 32 lines 17-27)

Applicant respectfully urges that Xu legally insufficient to anticipate Applicant's claimed novel invention under 35 U.S.C. 102 because of the absence from Xu of any disclosure of Applicant's claimed

receiving a file request concerning an indicated file from a client, the request received by a proxy;

forwarding the request from the proxy to a file server;

returning a reply associated with the file request from the file server to the proxy;

inserting, by the proxy, metadata into the file handle; and

sending, by the proxy, the file handle with the metadata inserted in the file handle to the client, the metadata to be used in further requests to identify the client and the indicated file.

Xu simply discloses using metadata for a data mover which bypasses an owner of a file, in order for the data mover to access the file.

That is, Applicant respectfully urges that Xu has no disclosure of Applicant's claimed *inserting, by the proxy, metadata into the file handle; and*

sending, by the proxy, the file handle with the metadata inserted in the file handle to the client, the metadata to be used in further requests to identify the client and the indicated file.

Further, Applicant respectfully urges that Xu has no disclosure of Applicant's claimed *inserting, by the proxy, metadata into the file handle*.

Even further, Applicant respectfully urges that Xu has no disclosure of Applicant's claimed *sending, by the proxy, the file handle with the metadata inserted in the file handle to the client, the metadata to be used in further requests to identify the client and the indicated file*.

Accordingly, Applicant respectfully urges that Xu is legally insufficient to anticipate Applicant's claimed invention under 35 U.S.C. 102 because of the absence from Xu of Applicant's claimed novel

receiving a file request concerning an indicated file from a client, the request received by a proxy;

forwarding the request from the proxy to a file server;

returning a reply associated with the file request from the file server to the proxy;

inserting, by the proxy, metadata into the file handle; and

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sending, by the proxy, the file handle with the metadata inserted in the file handle to the client, the metadata to be used in further requests to identify the client and the indicated file.

At Pages 6-8 of the Office Action, at Paragraph 1, the Examiner filed a response to Applicant's arguments regarding a 35 U.S.C. 101 rejection. Amendment of the claims is believed to satisfy this rejection.

At Paragraph 2 of the Response to Arguments, it is asserted that Xu's metadata anticipates Applicant's claimed invention. However, Xu has no disclosure of Applicant's claimed novel structure

inserting, by the proxy, metadata into the file handle; and

sending, by the proxy, the file handle with the metadata inserted in the file handle to the client, the metadata to be used in further requests to identify the client and the indicated file.

Xu discloses no "file handle", and has no disclosure of *inserting, by the proxy, metadata into the file handle*.

NEW CLAIMS

All new claims are believed to be in condition for allowance.

As set forth in representative new claim 31, Applicant's invention is claimed by

the NEW claims as:

31. (New) A method for establishing identity in a file system, comprising:

receiving a first file request concerning an indicated file from a client, the first file request received by a proxy;

forwarding the first file request from the proxy to a file server;

returning a reply associated with the first file request from the file server to the proxy;

inserting, by the proxy, metadata into the file handle;

sending, by the proxy, the file handle with the metadata inserted in the file handle to the client, the metadata to be used in further requests to identify the client and the indicated file;

sending a second file request by the client to the server;

including the metadata in a second file handle sent with the second file request;

receiving the second file request by the proxy;

identifying, in response to the metadata, that the client as permitted to submit the second file request;

sending the second file request to the file server and not sending the metadata with the second file handle to the file server; and

receiving by the proxy a second reply from the file server, and sending by the proxy the second reply to the client.

Applicant respectfully urges that neither Xu nor any other art of record discloses Applicant's claimed novel

inserting, by the proxy, metadata into the file handle;

sending, by the proxy, the file handle with the metadata inserted in the file handle to the client, the metadata to be used in further requests to identify the client and the indicated file;

sending a second file request by the client to the server;

including the metadata in a second file handle sent with the second file request;

receiving the second file request by the proxy;

identifying, in response to the metadata, that the client as permitted to submit the second file request.

In particular, it is respectfully urged that Xu has no disclosure of Applicant's claimed novel

inserting, by the proxy, metadata into the file handle . . . identifying, in response to the metadata, that the client as permitted to submit the second file request.

Accordingly, Applicant respectfully urges that all new claims are in condition for allowance.

Applicant's new claims are fully supported in the Specification at Page 4 lines 15-20; and in the figures at Fig. 1 and the discussion of Fig. 1 at Page 6 lines 9-10; and in the figures at Fig. 2 and the discussion of Fig. 2 at Page 6 line 24 through Page 7 line 7.

Further, Fig. 3 and its discussion at Page 7 lines 9-17 fully disclose the subject of representative claim 60, which reads:

60. (New) The apparatus of Claim 58, further comprising:
the proxy to use the metadata in the file handle received from the client to eliminate a need for additional communication with the file server to establish file identity.

Accordingly, Applicant respectfully urges that all independent claims are in condition for allowance.

All independent claims are believed to be in condition for allowance.

All dependent claims are believed to be dependent from allowable independent claims, and therefore in condition for allowance.

Favorable action is respectfully solicited.

Please charge any additional fee occasioned by this paper to our Deposit Account

No. 03-1237.

Respectfully submitted,

      /A. Sidney Johnston/
A. Sidney Johnston
Reg. No. 29,548
CESARI AND MCKENNA, LLP
88 Black Falcon Avenue
Boston, MA 02210-2414
(617) 951-2500